

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

429-441 86th STREET LLC,

Plaintiff,

-against-

TOWN SPORTS INTERNATIONAL
HOLDINGS, INC.

Defendant.

Index No. _____

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT
IN LIEU OF COMPLAINT**

PLEASE TAKE NOTICE that upon the Summons dated January 11, 2021; the Affidavit of Jeff Sutton, sworn to January 11, 2021, and exhibits thereto; and the Memorandum of Law in Support, dated January 11, 2021, Plaintiff 429-441 86th Street LLC will move this Court at the Motion Support Part (Room 130) of the Courthouse, located 60 Centre Street, New York, New York, at 9:30 A.M. on February 18, 2021, or as soon thereafter as counsel may be heard, for an order granting summary judgment in lieu of complaint based upon an instrument for the payment of money only pursuant to Section 3213 of the New York Civil Practice Law and Rules ("CPLR"), in favor of Plaintiff 429-441 86th Street LLC and against Defendant Town Sports International Holdings, Inc., in the sum of \$2,776,794.86, plus interest, costs of collection, reasonable attorneys' fees and disbursements, and such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR 2214(b) and applicable law, answering papers, if any, are required to be served upon the undersigned no later than seven (7) days before the return date of this motion.

Dated: New York, New York
January 11, 2021

WACHTEL MISSRY LLP

By: /s/Stella L. Sainty

Marc Litt

Stella L. Sainty

One Dag Hammarskjold Plaza

885 Second Avenue, 47th Floor

New York, New York 10017

(212) 909-9500

*Attorneys for Plaintiff 429-441 86th Street
LLC*